

RE: Re: OHSA Report

Hilbert, Timothy (hilbertj) to: Benson.Bob

10/05/2012 05:49 AM

From: "Hilbert, Timothy (hilbertj)" <HILBERTJ@UCMAIL.UC.EDU>

To:

Cc: Bill Brattin <brattin@srcinc.com>, Berry.David@epamail.epa.gov

Bob, You are correct. Trionizing jobs (except for the track jobs) were contained within a building which was constructed in 1956 and became operational in 1957. The railroad tracks were outside, just west of the trionizing building. The wall was built outside to isolate unload from the building.

Hope this helps. Let me know if you need additional information
Tim

-----Original Message-----

From: Bob Benson [mailto:Benson.Bob@epamail.epa.gov]

Sent: Thursday, October 04, 2012 9:12 PM

To: Hilbert, Timothy (hilbertj)

Cc: Bill Brattin; David Berry

Subject: RE: Re: OHSA Report

Tim,

While I agree with your response, Leonid is claiming that the trionizing jobs were outside prior to the contruction of the wall. Therefore I need to provide a simple response to that assertion. Is it accurate to say to Leonid that the trionizing jobs were physically contained within the Marysville facility from 1957 on and the 2 track jobs were the only jobs outside? And that the wall was built ouside in the track unload area to further isolate the track unload area from the building? This issue is obviously important to Leonid and he won't let go until we provide an answer based on the layout of the Marysville facility.

I need confirmation of the facts before I respond to Leonid.

I remember seeing a drawing of a conveyer system that tranported ore to the top of the expander units. I cannot believe the expanders would be in an outdoor area.

-----"Hilbert, Timothy (hilbertj)" <HILBERTJ@UCMAIL.UC.EDU> wrote:

To: Bob Benson/R8/USEPA/US@EPA

From: "Hilbert, Timothy (hilbertj)" <HILBERTJ@UCMAIL.UC.EDU>

Date: 10/04/2012 02:24PM

Cc: "Brattin, Bill" <brattin@srcinc.com>, David
Berry/R8/USEPA/US@EPA

Subject: RE: Re: OHSA Report

Bob,

How much of a division existed between track and the rest of trionizing prior to 1976 is not the important issue. The important issue is: should the slopes of declining exposures be the same for both indoor and outdoor jobs. The reason to not assume the same slope between the indoor jobs and the outdoor jobs is because we have documented efforts to reduce the indoor job exposures (pre 1976 wall) and no documentation of efforts to reduce outdoor exposures pre 1976. The efforts to reduce indoor exposures would not have a corresponding effect on outdoor exposures. Just because some of the exposure for the indoor jobs came from unloading prior to 1976 does not mean the exposures for the two areas should decline at the same rate.

-----Original Message-----

From: Bob Benson [mailto:Benson.Bob@epamail.epa.gov]

Sent: Wednesday, October 03, 2012 11:07 PM

To: Hilbert, Timothy (hilbertj); Bill Brattin; David Berry

Subject: Fw: Re: OSHA Report

Tim,

I need some help on issue 2 from Leonid. I thought the track unload and track other were outside and a conveyer system brought the ore into the expander facility and the rest of the trionizing tasks were inside. I thought the wall further isolated the track unload area and prevented more of the outside "dust" from getting inside the facility. Can you provide some information to justify? Bill,

I think Leonid is challenging the number of segments for trionizing versus track. Your thoughts on how to proceed?

-----Forwarded by Bob Benson/R8/USEPA/US on 10/03/2012 10:55PM ----

-

To: Bob Benson/R8/USEPA/US@EPA

From: Leonid Kopylev/DC/USEPA/US

Date: 10/03/2012 01:15PM

Cc: "Bill Brattin" <brattin@srcinc.com>, Danielle

DeVoney/DC/USEPA/US@EPA, David Berry/R8/USEPA/US@EPA,

HILBERTJ@UCMAIL.UC.EDU, Krista Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA

Subject: Re: OSHA Report

Bob,

the issues in OSHA report seem to me pre-dating JEM decisions. I see at least two issues from OSHA report that needs to be resolved before modeling:

1) description of clean-up activities doesn't seem to correspond to

IH measurements, as you say below

2) The wording in OSHA report leads one to believe that before 1976 there was no wall between expansion and tracks. That may mean that before 1976 there need not be division between outdoor and indoor jobs and afterwards it may be.

Leonid

Bob Benson---10/02/2012 10:26:15 PM---I can't access the complete IH data from home. Are you saying that the clean up values are lower th

From: Bob Benson/R8/USEPA/US

To: Leonid Kopylev/DC/USEPA/US@EPA

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Date: 10/02/2012 10:26 PM

Subject: Re: OSHA Report

I can't access the complete IH data from home. Are you saying that the clean up values are lower than the other trionizing jobs in late 1978 and contradict the OSHA inspectors observations about the workers sticking their heads in the equipment during clean up tasks?

At this point my focus is getting concurrence on the arithmetic mean based JEM. Let's focus on the priority task.

-----Leonid Kopylev/DC/USEPA/US wrote: -----

To: Bob Benson/R8/USEPA/US@EPA

From: Leonid Kopylev/DC/USEPA/US

Date: 10/02/2012 03:49PM

Cc: brattin@srcinc.com, Danielle DeVoney/DC/USEPA/US@EPA, David Berry/R8/USEPA/US@EPA, HILBERTJ@UCMAIL.UC.EDU, Krista Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA

Subject: Re: OSHA Report

The fitted plots would be fit to the data that is collected. The fitted values for clean-up for 1978 looks to be close to 0, not high at all.

Bob Benson---10/02/2012 05:44:44 PM---I am referring to the collection of fitted plots that Bill has constructed over the last month or so

From: Bob Benson/R8/USEPA/US

To: Leonid Kopylev/DC/USEPA/US@EPA

Cc: brattin@srcinc.com, Danielle DeVoney/DC/USEPA/US@EPA, David

Berry/R8/USEPA/US@EPA, HILBERTJ@UCMAIL.UC.EDU, Krista
Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA
Date: 10/02/2012 05:44 PM
Subject: Re: OSHA Report

I am referring to the collection of fitted plots that Bill has constructed over the last month or so. Comparing values, clean-up gives higher values than other trionizing tasks except feeder and expander.

Leonid Kopylev---10/02/2012 03:37:32 PM---Bob, Could you please specify what exactly IH data you have in mind for clean-up? What I see for 19
From: Leonid Kopylev/DC/USEPA/US
To: Bob Benson/R8/USEPA/US@EPA,
Cc: brattin@srcinc.com, Danielle DeVoney/DC/USEPA/US@EPA, David Berry/R8/USEPA/US@EPA, HILBERTJ@UCMAIL.UC.EDU, Krista Christensen/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA
Date: 10/02/2012 03:37 PM
Subject: Re: OSHA Report

Bob,
Could you please specify what exactly IH data you have in mind for clean-up? What I see for 1978 (time of OSHA report) clean-up IH measurements average to $<0.1f/cc$ and range between 0 and $0.9 f/cc$ and exponential fit for this year giving estimate close to 0.
Thanks,
Leonid

Bob Benson---10/02/2012 05:08:52 PM---I did read the material that Tim sent. At this point I think my preference is to expand the UC appe
From: Bob Benson/R8/USEPA/US
To: Leonid Kopylev/DC/USEPA/US@EPA, Thomas Bateson/DC/USEPA/US@EPA, Krista Christensen/DC/USEPA/US@EPA, Danielle DeVoney/DC/USEPA/US@EPA, brattin@srcinc.com, HILBERTJ@UCMAIL.UC.EDU, David Berry/R8/USEPA/US@EPA
Date: 10/02/2012 05:08 PM
Subject: OSHA Report

I did read the material that Tim sent. At this point I think my preference is to expand the UC appendix to put in some more detail on the operations in the facility and the dust control measures put in place, rather than cite another document. UC has a lot more information from other documents, company records, and the focus groups. The description from OHSA is entirely consistent with the IH data showing high exposure during clean-up. However, I will keep an open mind on this.

I started a new message string as this is a somewhat different topic.